

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

GREGORY B. CRAIG,

Defendant.

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Case No. 1:19-CR-00125 (ABJ)

GOVERNMENT'S UPDATED EXHIBIT LIST

The Government hereby files a revised exhibit list that has been updated to reflect the Court's rulings during the pretrial conference on August 6, 7, and 9, 2019, as well as the Court's Order of August 13, 2019. (ECF No. 93). The Government sets forth its understanding of the status of the following exhibits:

- The Government understands that **GX 8** has been ADMITTED.
- The Government understands that the objection to **GX 311** (MIL Procurement) has been denied, and the document is ADMITTED.
- Pursuant to stipulation between the parties, the Defense has withdrawn its objection to the admission of the document history reports at **GX 9, GX 10, and GX 452 – 457**, and they are ADMITTED.
- Ruling has been reserved on **GX 172** and **GX 596**.
- The Government WITHDRAWS **GX 159** and **GX 162**.

In addition, pursuant to the Court's Order of August 13, 2019 (ECF No. 93), and agreement reached between the parties, the following Government Exhibits are subject to specific limitations:

- Government agrees to introduce **GX 114** in addition to **GX 113**, but it is not required to do so at the same time.
- **GX 200** has been replaced with the longer email string found at USA-REL-0000925-26 (see also, **DX 88**).
- **GX 253, 264A, and 274** will be accompanied by a limiting instruction as to hearsay.
- **GX 306** is subject to laying foundation.
- **GX 326** can be used to establish chronology.
- **GX 396** will be accompanied by a limiting instruction as to hearsay.
- **GX 421** has been redacted.
- **GX 449** may be used for cross-examination.
- **GX 535** may be used for rebuttal.
- **GX 540**, if used, will be introduced with **DX 94** in succession.
- **GX 547** may be used for cross-examination.
- **GX 569, 570, and 572** may not all be used; the Government must choose one exhibit from the group.
- **GX 650 – 672** may be used as demonstratives.

Respectfully submitted,

JESSIE K. LIU
UNITED STATES ATTORNEY
D.C. Bar Number 472845

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Dated: August 15, 2019

Certificate of Service

I certify that, by virtue of the Court's ECF system, a copy of the Government's Updated Exhibit List has been sent to counsel for the Defendant on August 15, 2019.

/s/ Jason McCullough
Jason B.A. McCullough
Trial Attorney, NSD

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Case No. 1:19-CR-00125 (ABJ)

GOVERNMENT'S TRIAL EXHIBIT LIST

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
1	12/18/2012	Letter from Hunt to Yaffa	USA-00021397-00021421			
2	2/6/2013	Letter from Craig to Hunt	USA-00000091-00000142			
3	4/9/2013	Letter from Hunt to Craig	USA-REL-0304839-0304841			
4	6/3/2013	Letter from Craig to Hunt	USA-REL-0159226-0159241			
5	9/5/2013	Letter from Hunt to Craig	USA-REL-0304852-0304853			
6	9/19/2013	Email; FARA	USA-REL-0201346			
7	9/20/2013	Email; First draft of a response to FARA	USA-REL-0337507-0337510			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
8	9/24/2013	Draft of Letter to FARA Division in the Department of Justice	USA-REL-0201350 - 0201352			
9		Document History Report	USA-REL-0237374			
10		Document History Report	USA-REL-0237370			
11	9/26/2013	Letter from Craig to Hunt	USA-00000090			
12	10/10/2013	Letter from Craig to Hunt	USA-00000087-00000088			
13	1/16/2014	Letter from Hunt to Craig	USA-REL-0201303			
14	ND	OMB NO 1124-0001 FORM NSD-1	USA-00021350-00021356			
15	ND	OMB NO. 1124-0002 FORM NSD-2	USA-00021357-00021366			
16	ND	OMB NO 1124-0006 FORM NDS-3	USA-00021367-00021368			
17	ND	OMB NO. 1124-0004 FORM NSD-4	USA-00021369-00021370			
18	ND	OMB NO. 1124-0003 FORM NSD-5	USA-00021371-00021372			
19	ND	OMB NO. 1124-0005 FORM NSD-6	USA 00021373-00021374			
25	2/9/2012	Email; New business	USA-REL-0000409			
28	2/13/2012	Email; RE: Yulia Tymoshenko	USA-REL-0157963			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
30	2/13/2012	Email; RE: Yulia Tymoshenko	USA-REL-0157960-0157961			
31	2/13/2012	Email; RE: Yulia Tymoshenko	USA-REL-0157956-0157957			
32	2/13/2012	Email; Ukraine - Application of the Foreign Agents Registration Act of 1938 (FARA)	USA-REL-0176754-0176779			
34	2/20/2012	Email; Retainer letter	USA-REL-0000411-0000422			
35	2/28/2012	Email; Anything new	USA-REL-0110384			
36	2/28/2012	Email; RE: Are you free to talk	USA-REL-0000435			
37	3/1/2012	Email; Re: Retainer letter	USA-REL-0000436			
38	3/6/2012	Email; Re: Retainer letter	USA-REL-0000450-0000451			
39	3/6/2012	Email; Retainer letter and Next Steps	USA-REL-0000447-0000449			
40	3/17/2012	Email; RE: Good time to catch up today	USA-REL-0000459			
41	3/19/2012	Email; Re: Money	USA-REL-0000463			
42	3/20/2012	Email; Re: Dates for trip	USA-REL-0000472-0000474			
43	3/22/2012	Email; Re: Meeting tomorrow	USA-REL-0008100			
44	3/23/2012	Calendar; Paul Manafort Mtg	USA-REL-0336965			
46	4/5/2012	Document; Notes of meetings	USA-REL0160995			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
47	4/5/2012	Email; Re [] Press Release	USA-REL-0177315-0177316			
48	4/5/2012	Email; Re [] Press Release	USA-REL-0177311-0177312			
49	4/5/2012	Email; Re [] Press Release	USA-REL-0177308-0177310			
50	4/5/2012	Email; Re [] Press Release	USA-REL-0177317-19			
51	4/5/2012	Email; Re: Got a good report	USA-REL-000647			
52	4/5/2012	Email; Re: Tomorrow - Friday 4/6	USA-REL-0027690			
53	4/6/2012	Email; Re: Tomorrow - Friday 4/6	USA-REL-0158092-0158093			
54	4/7/2012	Email; Re: Tomorrow - Friday 4/6	USA-REL-0027698-0027700			
55	4/10/2012	Email; Procurator General wants us there	USA-REL-0008265			
56	4/11/2012	Email; Re:	USA-REL-0158098			
57	4/11/2012	Email; Re: Kuzmin on New charges against Tymo	USA-REL-0043806-0043811			
59	4/11/2012	Email; Re: Urgent Problem	USA-REL-0000664			
60	4/12/2012	Email; Re: Confirmation	USA-REL-0000663-67			
61	4/13/2012	Email; Re: Ukraine Project	USA-REL-0177816			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
63	4/16/2012	Email; Re: re Ukraine wire	USA-REL-0177876-0177877			
64	4/16/2012	Email; FARA issues	USA-REL-0177874-0177875			
66	4/17/2012	Email; FARA issues	USA-REL-0046192			
67	4/17/2012	Email; FW: Ukraine - Application of the Foreign Agents Registration Act of 1938 ("FARA") PROPER ATTACHMENTS	USA-REL-0163015-0163041			
68	4/17/2012	Email; RE: FARA Issues	USA-REL-0045044			
70	4/17/2012	Email; Re: FARA issues	USA-REL-0111929-0111930			
71	4/17/2012	Email; FARA issues	USA-REL-0111932-0111933			
100	4/19/2012	Email; PR Issues	USA-REL-0168280			
101	4/23/2012	Email; Ukraine Status Report	USA-REL-0046959-61			
102	4/27/2012	Email; PR Firms	USA-REL-0047010			
103	4/30/2012	Email; FW: Ukraine - Application of the Foreign Agents Registration Act of 1938 ("FARA") PROPER ATTACHMENTS	USA-REL-0027382-0027384			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
104	4/30/2012	Email; RE: 1230 at Hay Adams	USA-REL-0000712			
105	4/30/2012	Email; FW: PR Firms [Redacted]	USA-REL-0000711			
106	5/1/2012	Email; RE: Confidential: Prospective client	USA-REL-0341095			
107	5/3/2012	Email; Meeting Notes: 5/2/12	USA-REL-0114889-0114893			
108	5/3/2012	Email; Re: Action Item	USA-REL-0000730-0000733			
109	5/3/2012	Email; Investigation of Tymo allegations of "beating"	USA-REL-0114885-0114888			
110	5/3/2012	Email; RE: Investigation of Tymo allegations of "beating"	USA-REL-0047088			
111	5/3/2012	Email; Resolving Letter Agreement Issue	USA-REL-0000722-0000729			
112	5/7/2012	Email; PR Update	USA-REL-00047232-00047234			
113	5/7/2012	Email; RE: Tymo	USA-REL-0047212-13			
114	5/7/2012	Email; RE: Tymo	USA-REL-0027354-56			
115	5/9/2012	Email; RE:	USA-REL-0027792-93			
116	5/10/2012	Email; RE: Kiev	USA-REL-0341033-0341036			
117	5/10/2012	Email; FTI	USA-REL-0000769			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
118	5/11/2012	Email; Confidential: Project Veritas contract	USA-REL-0341125-26			
119	5/12/2012	Email; Ukraine	USA-REL-0341414-0341415			
121	5/15/2012	Email; Tymo -- your plans	USA-REL-0348634-0348637			
122	5/15/2012	Email; The Ministry of Justice, Government of Ukraine	USA-REL-0158406			
123	5/18/2012	Email; Project Veritas	USA-REL-0347003-00347004			
124	5/22/2012	Email; Letter to Mr. Vlasenko and Ms. Tymoshenko delivered	USA-REL-0170204-0170206			
126	5/22/2012	Email; Re: Delivery of letter to Vlasenko	USA-REL-0000841-0000842			
127	5/22/2012	Email; Re: Press statements	USA-REL-0348566-0348570			
128	5/22/2012	Email; Re: Press statements	USA-REL-0345061-0345066			
129	5/22/2012	Email; Re: Press statements	USA-REL-0348047-0348052			
130	5/22/2012	Email; Re: Press statements	USA-REL-0349988-0349994			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
131	5/22/2012	Email; Re: Press statements	USA-REL-0115565-00115568			
132	5/22/2012	Email; Re: Press statements	USA-REL-0346816			
133	5/23/2012	Email; Re: Press statements	USA-REL-0115733-0115739			
149	5/24/2012	Email; FW:	USA-REL-0000876-0000889			
150	5/24/2012	Email; Re: Letter Agreement	USA-REL-0008393			
151	5/29/2012	Email; Re: Ukraine engagement	USA-REL-0341345-0341348			
152	5/29/2012	Email; Re: Ukraine engagement	USA-REL-0341349-0341352			
154	6/5/2012	Email; RE: Letter	USA-REL-0171488-0171490			
155	6/6/2012	Email: Ukraine update	USA-REL-0344307			
156	6/6/2012	Email: Re: getting together [Redacted]	USA-REL-0000890-0000892			
157	6/7/2012	Email; Tymo - FTI Call	USA-REL-0171740-42			
158	6/11/2012	Email; Re: Schedule for the Week	USA-REL-0171872-0171873			
160	6/14/2012	Email; RE: Project 2	USA-REL-0172187			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
161	6/15/2012	Email; []	USA-REL-0348605-0348613			
163	6/21/2012	Email: Re: Project Two	USA-REL-0172558-0172559			
164	6/21/2012	Email: FW: Application of the Foreign Agents Registration Act of 1928 ("FARA") PROPER ATTACHMENTS	USA-REL-0180790-0180819			
165	6/22/2012	Email; Re ?????????? 95 ???????????	USA-REL-0000914			
166	6/24/2012	Email; Legal Report	UUSA-REL2-0003962			
167	6/25/2012	Email; RE: Vlasenko	USA-REL-0050383			
170	7/2/2012	Email; RE: Tymoschenko	USA-REL-0158609			
171	7/9/2012	Email; FTI	USA-REL-0051030			
172	7/10/2012	Email; Re: Tymo Project 2 Meetings	USA-REL-0172966-0172968			
173	7/12/2012	Email; PK: Vin Weber, Top Romney Advisor, Lobbying for Ukraine Group	USA-REL-0162978-0162980			
174	7/13/2012	Email; Plan	USA-REL-0350561-0350574			
176	7/14/2012	Email; Project Veritas - Communications Strategy	USA-REL-0351221-235			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
177	7/15/2012	Email; Re: update today	USA-REL-0000919			
178	7/15/2012	Email; Team Ukraine Status	USA-REL-0124934-0125074			
179	7/16/2012	Email; Schedule for upcoming Kyiv trip	USA-REL-0165378-0165383			
180	7/18/2012	Email; PR on Project One	USA-REL-0223827			
181	7/18/2012	Email; Ukraine Update	USA-REL-0200242			
182	7/20/2012	Email; Kiev Update	USA-REL-0125726-0125741			
183	7/25/2012	Email; Re: free to talk	USA-REL-0008582			
184	7/27/2012	Email; Draft Report	USA-REL-0008596-0008777			
185	7/27/2012	Email; Re: Draft Report	USA-REL-0008592-0008593			
186	7/27/2012	Email; Re: info needed for Ukraine	USA-REL-0194847-0194848			
187	7/27/2012	Email; Changes	USA-REL-0008591			
188	7/27/2012	Email; Re: Changes	USA-REL-0008589			
189	7/28/2012	Email; Media Plan	USA-REL-0348576-0348580			
190	7/29/2012	Email; Report: The Tymoshenko Case	USA-REL-00053856-00054251			
200	7/30/2012	Email; RE: Language Issues	USA-REL-0000925-26			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
201	7/31/2012	Email; Re: Conclusions / incarceration	USA-REL-0184297-0184298			
202	7/31/2012	Email; Re: Conclusions / incarceration	USA-REL-0184266-0184269			
203	8/1/2012	Email; New Draft	USA-REL-0000927-28			
204	8/1/2012	Email; RE: Slattery	USA-REL-0193673-109674			
205	8/3/2012	Email; Manafort is seeing BG on Wednesday	USA-REL-0136184			
206	8/3/2012	Email; Project One Report - The Tymoshenko Case	USA-REL-0009382-0009677			
207	8/5/2012	Email; Draft plan	USA-REL-0351144-0351191			
208	8/7/2012	Email; Tymo report - action points and questions	USA-REL-0136194			
209	8/9/2012	Email; Kyiv Post Editorial: Skadden Sting	USA-REL-0176355			
210	8/9/2012	Email; RE: Kyiv Post Editorial: Skadden Stink	USA-REL-0136202-0136203			
211	8/10/2012	Email; Ukraine Payment	USA-REL-0184954			
212	8/13/2012	Email; Ukraine disclosure idea	USA-REL-0185184			
214	8/14/2012	Email: Re: VP or MOJ	USA-REL-0001239			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
216	8/22/2012	Email; Here is the letter re fees	USA-REL-0009993-0009995			
217	8/22/2012	Email; Re: Here is the letter re fees	USA-REL-0001271-0001273			
218	8/22/2012	Email; Re: Here is the letter re fees	USA-REL-0009991-92			
219	8/23/2012	Email; Letter to MOJ	USA-REL-0005669-0005670			
220	8/24/2012	Email; Fw: Update	USA-REL-0342746			
221	8/28/2012	Email; FW:	USA-REL-0143608-0143625			
222	8/29/2012	Email; Re: Ukraine	USA-REL-0343574-034575			
223	8/29/2012	Email; Time to talk re. MOJ report?	USA-REL-0187258-0187259			
224	8/30/2012	Email; Re: Work Schedule to finalize report	USA-REL-0144020-0144022			
225	8/30/2012	Email; Re: Work Schedule to finalize report	USA-REL-0006015-0006016			
226	8/30/2012	Email; Re: Project 2	USA-REL-0144052-0144053			
227	8/30/2012	Email; Memo for Manafort	USA-REL-0344875-91			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
228	9/3/2012	Manafort to Craig; subj: URGENT: Actions this week - Wrapping up	USA-REL-0006051-53			
229	9/5/2012	Email; Ukraine	USA-REL-0350232			
230	9/10/2012	Email; Re:	USA-REL-0006093			
231	9/11/2012	Email; Document	USA-REL-0342368			
232	9/12/2012	Email; Updates	USA-REL-0348008			
233	9/12/2012	Email; MY COMMENTS	USA-REL-0344423-33			
234	9/17/2012	Email; Document	USA-REL-0345529-0345831			
250	9/13/2012	Email; FTI PLAN FOR RELEASE	USA-REL-0007062-66			
251	9/18/2012	Email; meeting today	USA-REL-0007075			
252	9/19/2012	Email; FW: Here	USA-REL-0148186-0148191			
253	9/21/2012	Email; meeting on Sunday	USA-REL-0350747-73			
254	9/23/2012	Email; Documents	USA-REL-0019487-0019559			
255	9/23/2012	Email; Points coming out of today's meeting in NY	USA-REL-0082763			
256	9/23/2012	Email; Meeting tomorrow morning	USA-REL-0029796			
257	9/23/2012	Email; Meeting tomorrow morning	USA-REL-0344296-97			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
258	9/24/2012	Email; Re: Notes from yesterday	USA-REL-0347958-60			
259	9/24/2012	Email; Ukraine	USA-REL-0149306			
260	9/24/2012	Email; Question re Release Planning in Ukraine	USA-REL-0029800			
261	9/24/2012	Email; Backgrounding journalists	USA-REL-0019650			
262	9/24/2012	Email; Re: Question re Release Planning in Ukraine	USA-REL-0029798-99			
263	9/24/2012	Email; Re: Backgrounding Journalists	USA-REL-0019649			
264	9/24/2012	Email; Re: Backgrounding Journalists	USA-REL-0019648			
264A	9/24/2012	Email; Re: Backgrounding Journalists	USA-REL-0007498			
265	9/24/2012	Email; Two Problems	USA-REL-0149233			
266	9/24/2012	Email; Re: Two problems	USA-REL-0150940			
267	9/25/2012	Email; Re: Draft messaging	USA-REL-0007508-0007510			
268	9/25/2012	Email; FW: Email from Greg Craig	USA-REL-0149958-0149959			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
269	9/25/2012	Email; FW Email from Greg Craig	USA-REL-0150943			
270	9/25/2012	Email; Re: Meeting and Items	USA-REL-0342809			
272	9/25/2012	Email; Re: Point 5	USA-REL-0346747-50			
273	9/26/2012	Email; Meeting Agenda	USA-0016371-0016372			
274	9/27/2012	Email; PJM Outline of Findings	USA-REL-0346213-0346216			
275	9/28/2012	Email; Greg	USA-REL-0344436			
276	9/30/2012	Email; Re: Document	USA-REL-0341948-0341958			
277	9/30/2012	Email; Wave 2	USA-REL-0342832			
278	10/1/2012	Calendar; ECFMU/Ukraine Call with attachment DC Consultants Plan 9-28- 1012.xlsx	USA-REL2-0017111-12			
279	10/2/2012	Email; Fw: another set of comments	USA-REL-0151623-30			
280	10/2/2012	Email; Re: Master Grid	USA-REL-0344302-0344306			
281	10/2/2012	Email; Matrix - Actions	USA-REL-0347947-0347948			
300	10/2/2012	Email; David Sanger (NY Times)	USA-REL-0193917			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
301	10/2/2012	Email;	USA-REL-0193916			
302	10/2/2012	Email; Re: Ukraine	USA-REL-0160104			
303	10/3/2012	Email; Fw: Ukraine	USA-REL-0193922			
304	10/3/2012	Email; Fw: UKraine	USA-REL-0193921			
305	10/3/2012	Email; Fwd: MCG	USA-REL-0344042-0344046			
306	10/3/2012	Document; Skadden Report Roll Out Plan by Mercury/Clark & Weinstock	USAODC-000003-000005			
307	10/3/2012	Email; Re: Call number for [] roundtable at 3pm 202-xxx-xxxx	USA-REL-0191404			
310	11/19/2012	Email; Your final issues	USA-REL-0007604			
311	11/20/2012	Email; Timing of Delivery	USA-REL-0007606			
312	11/26/2012	Email; Re: Report	USA-REL-0366346-0366441			
313	11/28/2012	Email; Greg's Memo	USA-REL-0020062-0020067			
315	11/30/2012	Email; The Report	USA-REL-0020091			
316	12/6/2012	Email; Project Veritas	USA-REL-0029942			
317	12/6/2012	Email; Updated docs	USA-REL-0366688-0366781			
318	12/6/2012	Email; Docs	USA-REL-0366782			
319	12/6/2012	Email; Jonathan Hawker - 011 44 7979 907000	USA-REL-0193987			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
320	12/6/2012	Email; report release date	USA-REL-0191850			
321	12/6/2012	Email; report release date	USA-REL-0038263			
322	12/6/2012	Email; Phase One media	USA-REL-0366783-0366784			
323	12/6/2012	Email; Updated docs	USA-REL-0365631			
325	12/7/2012	Email; Call with Vin Weber today	USA-REL-0193988			
326	12/7/2012	Email; Did Rick Gates reach you?	USA-REL-0159064			
327	12/10/2012	Email; Master Grid	USA-REL-0366916 + attachment			
328	12/10/2012	Email; Journalist contact details needed	USA-REL-0365739			
329	12/11/2012	Email; In reception	USA-REL-0366918			
331	12/11/2012	Email; Update	USA-REL-0020098			
332	12/11/2012	Email; Greg Craig	USA-REL-0029969			
350	12/11/2012	Email; Ukraine	USA-REL-0160113			
351	12/11/2012	Email; Ukraine	USA-REL-0029972			
352	12/11/2012	Email; Ukraine	USA-REL-0160111-0160112			
353	12/11/2012	Email; Ukraine	USA-REL-0159068-0159069			
354	12/11/2012	Email; Ukraine	USA-REL-0160114-0160115			
355	12/11/2012	Email; Report on the Tymoshenko case	USA-REL-0161002			
356	12/11/2012	Email; Ukraine	USA-REL-0159066-0159067			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
357	12/11/2012	Email; Electronic Delivery	USA-REL-0159065			
359	12/11/2012	Email; Sanger conversation	USA-REL-0160998			
360	12/11/2012	Email; Electronic delivery	USA-REL-0029971			
361	12/11/2012	Email; Re: Warsaw	USA-REL-0038299			
362	12/11/2012	Email; Report on the Tymoshenko case	USA-REL-0194866			
363	12/12/2012	Email; Ukraine	USA-REL-0366783-0366784			
364	12/12/2012	Email; Hawker to Craig; subj: First journalist	USA-REL-0193997			
366	12/12/2012	Email; Report on the Tymoshenko case	USA-REL-0160123			
367	12/12/2012	Email; Report on the Tymoshenko case	USA-REL-0160124			
368	12/12/2012	Email; Report on the Tymoshenko case	USA-REL-0194880			
369	12/12/2012	Email; On Behalf of Greg Craig - The Tymoshenko Case	USA-REL-0152360-0152663			
370	12/12/2012	Email; Sanger received the pdf of the report	USA-REL-0194887			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
371	12/12/2012	Email; Daily Telegraph - quotes approval - pls confirm receipt	USA-REL-0194883			
372	12/12/2012	Email; Ukraine story - please confirm receipt	USA-REL-0367342-0367347			
373	12/12/2012	Email; Report on the Tymoshenko case	USA-REL-0194874-0194875			
374	12/12/2012	Email; Daily Telegraph - quotes approval - pls confirm receipt	USA-REL-0191884-0191886			
375	12/12/2012	Email; Times	USA-REL-0029981			
376	12/12/2012	Email; hello and questions, from NYT Moscow	USA-REL-0160119-0160120			
377	12/12/2012	Email; Ukraine	USA-REL-0161012			
378	12/12/2012	Email; Ukraine	USA-REL-0161000			
379	12/12/2012	Email; quote re political motivation	USA-REL-0161011			
380	12/12/2012	Email; Release time	USA-REL-0161010			
381	12/13/2012	Email; Heads up on Ukraine	USA-REL-0201013			
382	12/13/2012	Email; Press contact for Ukraine/MoJ report	USA-REL-0194003			
383	12/13/2012	Email; Report Coverage	USA-REL-0973088-0973090			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
384	12/13/2012	Email; Report Coverage	USA-REL-0367672-0367676			
385	12/13/2012	Email; Press contact for Ukraine/MoJ report	USA-REL-0106944-0106945			
386	12/13/2012	Email; URGENT - corruption allegation	USA-REL-0029988-0029989			
387	12/13/2012	Email; Legal Times / National Law Journal	USA-REL-0160532			
388	12/13/2012	Email; Media Inquiry re MOJ FW: Kommersant Ukraine	USA-REL-0030309-0030310			
389	12/13/2012	Email; Copy of Tymoshenko report and interview?	USA-REL-0194993			
390	12/13/2012	Email; On Behalf of Greg Craig - The Tymoshenko Case	USA-REL-0153606			
391	12/13/2012	Email; Legal Times	USA-REL-0160133			
392	12/13/2012	Email; Media Inquiry re MOJ FW: Kommersant Ukraine	USA-REL-0030300-0030302			
394	12/13/2012	Email; On Behalf of Greg Craig - The Tymoshenko Case	USA-REL-0160125-0160127			
395	12/13/2012	Email; Ukraine Report in the Press	USA-REL-0191899			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
396	12/13/2012	Email; Well Done	USA-REL-0020151			
397	12/13/2012	Email; The Tymoshenko Case	USA-REL-0029994			
398	12/14/2012	Email; Former Ukrainian leader's trial was fair but flawed	USA-REL-0160459-0160460			
399	12/14/2012	Tymoshenko Report - NLJ	USA-REL-0195644			
400	12/14/2012	Email; Matthew Huisman should be calling Greg shortly	USA-REL-0195662			
401	12/14/2012	Email; Draft for your comments	USA-REL-0160442-0160443			
403	12/13/2012	<i>New York Times</i> article	USAO-00022275, 77			
410	12/22/2012	Email; Subject: Request for information from DOJ re Tymoshenko trial review	USA-REL-020130			
411	1/4/2013	Email; Subject: Draft answers to (3) and (4)	USA-REL-0304585-0304586			
412	1/4/2013	Email; Subject: Re: Request for informaiton from DOJ re Tymoshenko trial review	USA-REL-0304587-0304589			
413	1/5/2013	Email; Subject: Re: Request for informaiton from DOJ re Tymoshenko trial review	USA-REL-0304597-0304599			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
414	1/7/2013	Email; Not so fast	USA-REL-0201043			
415	1/14/2013	Email; Subject: Revision	USA-REL-0304626-0304627			
417	1/16/2013	Email; Subject: Re: Ukraine: See attached response to DOJ for your review	USA-REL-0304633(email only)			
418	2/6/2013	Email; Subject: Re: FARA Response	USA-REL-0304655			
419	2/7/2013	Email; Subject: Re: Letter from Gregory B. Craig	USA-REL-0201123-0201124			
420	2/7/2013	Email; Subject: FW: Greg's letter to Justice	USA-REL-0201127-0201179			
421	3/13/2013	Email; Subject: RE: News article re contracts	USA-REL-0201233-35			
422	4/4/2013	Email; Subject: Responding to FARA letter re Ukraine	USA-REL-0304734			
425	4/15/2013	Email; Subject: RE: Are you here?	USA-REL-0201242			
426	4/22/2013	Email; Subject: RE: News articles about Ukraine Report	USA-REL-0155404-0155409			
427	4/29/2013	Email; Subject: Draft response to FARA inquiry	USA-REL-0304736-0304737			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
428	5/1/2013	Email; Subject: Next draft--with some embellishments	USA-REL-0304738-0304740			
429	5/1/2013	Email; Tweaks	USA-REL-0340523-0340524			
430	5/1/2013	Email; Subject: please put in final form for my signature	USA-REL-0339232-0339235			
431	5/15/2013	Email; Subject: updated response to FARA	USA-REL-0304755-0304758			
432	5/17/2013	Email; Re: Can we talk?	USA-REL-0159211			
433	5/20/2013	Email; Subject: FW: updated response to FARA	USA-REL-0304778-0304781			
434	5/20/2013	Email; Subject: FW: Next draft -- with some embellishments	USA-REL-0304775-0304777			
435	5/20/2013	Email; Subject: Change-Pro Redline - Response to FARA Inquiry 1249781 v1. and Response to Inquiry (revised) 1248782 v1.	USA-REL-0304770-0304774			
436	5/20/2013	Email; Subject: latest document	USA-REL-0339236-0339237			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
437	5/20/2013	Email; Subject: Change-Pro Redline - Respose to Inquiry (revised) 1249782 v. 1. and Revised Response (2nd Round) 1249802) v.1	USA-REL-0337011-0337015			
438	5/20/2012	Email; Subject: Change-Pro Redline - Response to FARA Inquiry 1249781 v1. Revised Response (2nd Round) 1249802 v1	USA-REL-0337006-0337010			
439	5/20/2012	Email; Subject: Fara Response	USA-REL-0304759-0304763			
440	5/20/2012	Email; Subject: Change-Pro Redline - Response to FARA Inquiry 1249781 v1. and Response to FARA Inquiry (most current version) 1249835 v1.	USA-REL-0337001-0337005			
441	5/22/2013	Email; Re: Call	USA-REL-0159212			
442	5/28/2012	Email; Subject: FW: Scanned Documents	USA-REL-0304796-0304799			
443	5/28/2013	Email; Subject: RE: Scanned Documents	USA-REL-0304800			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
444	5/28/2013	Email; Subject: FW: Scanned Documents	USA-REL-0304801			
445	5/29/2013	Email; Subject: FW: Letter to DOJ	USA-REL-0304827-0304830			
446	5/29/2013	Email; Subject: RE: Letter to DOJ	USA-REL-0304822			
447	5/29/2013	Email; Subject: RE: Letter to DOJ	USA-REL-0304821			
448	5/29/2013	Email; Subject: Fw: Letter to DOJ	USA-REL-0304812-0304815			
449	5/29/2013	Email; Just got home	USA-REL-0194053			
450	5/31/2013	Email; Subject: FW: FARA Response	USA-REL-0304846-0304847			
451	6/3/2013	Email; put in final form	USA-REL-0340518-0340522			
452		Document History Report	UAS-REL-0337527			
453		Document History Report	USA-REL-0337530			
454		Document History Report	USA-REL-0337532			
455		Document History Report	USA-REL-0337536-0337537			
456		Document History Report	USA-REL-0337539			
457		Document History Report	USA-REL-0337527			
460	9/11/2013	Email; Subject: FARA reply	USA-REL-0304851-0304853			
461	9/11/2013	Email; Subject: FW: FARA Reply	USA-REL-0201243-0201245			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
462	9/12/2013	Email; Subject: Fwd: FARA Reply	USA-REL-0304859			
463	9/12/2013	Email; Subject: Re: FARA Reply	USA-REL-0304854			
464	9/19/2013	Email; Subject: RE: FARA reply	USA-REL-0304864			
466	9/19/2013	Email; Subject: FW: FARA	USA-REL-0337016			
468	9/20/2013	Email; Subject: FW: First draft of a response to FARA	USA-REL-0304865-0304868			
470	9/24/2013	Draft Response to FARA	USA-REL-0201350-0201352			
471	9/25/2013	Email; Subject: Re: Alex Mudd - DOJ - 202-233-0777	USA-REL-0304870			
472	10/8/2013	Email; Subject: FW: FARA letter	USA-REL-0303713-0303715			
473	10/8/2013	Email; Subject: FW: FARA letter	USA-REL-0303717			
474	10/10/2013	Email; Subject: RE: One page FARA letter	GBC 001			
475	10/15/2013	Email; Subject: FW: On Behalf of Greg Craig - The Tymoshenko Case	USA-REL-0160840-0160841			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
476	10/15/2013	Email; Subject: FW: FINAL letter to H Hunt re FARA	USA-REL-0201299-0201301			
477	11/5/2013	Skadden bill for services rendered through September 30, 2013	USA-REL-0000215-0000216			
478	11/21/2013	Skadden bill for services rendered through October 31, 2013	USA-REL0000217-0000219			
479	Multiple	Skadden Client Escrow Account # 15662391 for Douglas E. Schoen NYC, LLC	USA-REL-0000231-0000263			
480	1/27/2014	Email; Subject: FW: FARA letter from DOJ	USA-REL-0303825-0303826			
		HARD COPY DOCUMENTS				
500	ND	Multi-page document with header: Project Veritas Communications Strategy	USA-REL-0339091-0339104			
503	7/27/2012	Memorandum from PJM to SL; Subj: SA Report - Media Plan	USA-REL-0337749-0337765			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
505	8/30/2012	Email; Hawker to kk22314@gmail.com; Subj: Confidential: Report and the media	USA-REL-0339016			
506	12/12/2012	Article; Failings Found in Trial of Ukrainian Ex-Premier, The New York Times	USA-REL-0339017-0339019			
510	12/13/2012	Article; Ukraine lawmakers brawl; report finds Tymoshenko trial flawed	USA-REL-0339165			
517	ND	One-page document with header: Response to April 9, 2013 Letter from National Security Division, US Department of Justice	USA-REL-0339029			
518	5/20/2013	One-page document with header: Response to April 9, 2013 Letter from National Security Division, US Department of Justice	USA-REL-0339030-0339033			
521	9/24/2013	Draft of Letter to FARA Division in the Department of Justice	USA-REL-0339059-0339061			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
522	10/8/2013	Printout from website, www.fara.gov	USA-REL-0339169-0339177			
523	10/8/2013	Printout from website, www.fara.gov	USA-REL-0339178-0339179			
525	3/28/2012	Skadden New Client or Business Unit Memorandum, signed by Gregory Craig	USA-REL-0338196-0338201			
528	4/10/2012	Letter from Craig to Ministry of Justice; Subj: Retainer Memorandum	USA-REL-0338963-0338969			
529	ND	Two-page note on stationery of Intercontinental Hotel, Ukraine	USA-REL-0338918-0338919			
530	ND	One-page note on stationery of Hyatt Regency Kyiv	USA-REL-0338406			
531	ND	One-page of handwritten notes with header: Manafort telcon	USA-REL-0338904			
532	4/16/2012	Three-page document with header: Themes for Opening Statement	USA-REL-0338979-0338981			
534	4/30/2012	Project Kyiv: Status Report	USA-REL-0338982			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
535	5/2/2012	Invitation to team call for Skadden personnel	USA-REL-0338983			
536	9/8/2012	One-page of handwritten notes with header Telcon w/ Vlasenko	USA-REL-0338913			
537A	8/3/2012	Multi-page document; Comments on the Report and handwritten comments	USA-REL-0027599-002760			
537B	ND	Comments on the Report and handwritten comments	USA-REL-027606			
537C	9/11/2012	Comments on the Report and handwritten comments	USA-REL-0027607-08			
540	ND	Multi-page document with cover sheet entry: Comments from OGP + Oval Office	USA-REL-0338933-0338948			
544	ND	Multi-page document addressed to "Greg" re: changes requested in the memo that you received last week	USA-REL-0339124-0339127			
548	ND	Multi-page document re: July 16, 2012, Letter from Craig to Ministry of Justice of Ukraine	USA-REL-0237377-0237382			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
549	ND	Collection of documents re: Backup bill to MOJ-Ukraine	USA-REL-0237383-0237409			
550	4/22/2013	Collection of documents re: Payment from Ukraine	USA-REL-0337768-0337780			
		FINANCIAL DOCUMENTS				
560	3/20/2012	Check from Douglas E. Schoen NYC LLC payable to Skadden Arps in amount of \$150,000	USA-REL-0000220			
561	4/19/2012	Transaction Detail Advice Inquiry	USA-REL-0000223			
562	5/2/2012	Skadden bill for services rendered rendered through March 2012	USA-REL-0000121-0000123			
563	5/18/2012	Skadden bill for services rendered through April 30, 2012	USA-REL-0000124-0000134			
564	5/20/2012	Transaction Detail Advice Inquiry	USA-REL-0000224			
565	5/22/2012	Email; Letter to Vlasenko and Ms. Tymoshenko delivered	USA-REL-0170204-0170206			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
566	5/26/2012	Email; Tymoshenko case	USA-REL-0049961-0049962			
567	5/28/2012	Email; Draft response to Vlasenko's email	USA-REL-0049945-0049947			
568	6/22/2012	Email; [blank]	USA-REL-0180870-0180872			
569	6/22/2012	Email; Lavrinovich hired Skadden for less than 13 000 USD	USA-REL-0180868			
570	6/22/2012	Email; RAPS.com: U.S. attorneys in ECHR under Tymoshenko case to cost Ukraine \$12,5	USA-REL-0000915			
571	6/22/2012	Email; Heads up	USA-REL-0008538			
572	6/22/2012	Email; [cyrillic]	USA-REL-0000913			
573	6/26/2012	Skadden bill for services rendered through May 31, 2012	USA-REL-0000135-0000152			
574	7/13/2012	Transaction Detail Advice Inquiry	USA-REL-0000225			
575	7/24/2012	Skadden bill for services rendered through June 30, 2012	USA-REL-0000153-0000172			
576	8/9/2012	Email; Kyiv Post Editorial: Skadden Stink	USA-REL-0136202			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
577	8/9/2012	Email; Kyiv Post Editorial: Skadden Stink	USA-REL-0176348-0176350			
578	8/10/2012	Email; Update	USA-REL-0001233			
579	8/10/2012	Email; Ukraine payment	USA-REL-0185163			
580	8/13/2012	Email; this mornin	USA-REL-0001236			
581	8/15/2012	Email; updates	USA-REL-0001247-0001248			
582	8/15/2012	Email; Procedure for Supplemental Payments	USA-REL-0001246			
583	8/16/2012	Email; updates	USA-REL-0001253-0001255			
584	8/20/2012	Skadden bill for services rendered through July 31, 2012	USA-REL-0000173-0000189			
585	8/20/2012	Email; Letter to MOJ	USA-REL-0001265			
586	8/22/2012	Letter; Outstanding Balance Due	USA-REL-0000190-0000191			
587	8/23/2012	Email; SK Letter to MOJ.pdf	USA-REL-0005669			
588	11/2/2012	Skadden bill for services rendered through August 31, 2012	USA-REL-0000192-0000198			
589	11/2/2012	Email; Ukraine	USA-REL-0193953			
590	12/21/2012	Email; Quick Meeting	USA-REL-0159075			
591	12/26/2012	Email; CATCH UP	USA-REL-0194010			
592	12/28/2012	Email; CATCH UP	USSA-REL-0159078-0159079			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
593	1/4/2013	Letter; Invoice for services rendered through January 4, 2013	USA-REL-0339263-0339272			
594	1/8/2013	Email; Meeting Tomorrow	USA-REL-0020240			
595	2/5/2013	Email; Paperwork	USA-REL-0020244			
596	2/8/2013	Email; Question from MOJ	USA-REL-0007981-0007987			
597	2/8/2013	Email; Question from MOJ	USA-REL-0107944-0107945			
598	2/15/2013	Email; New Contract	USA-REL-0107995-0107997			
599	2/19/2013	Email; Comments on MOJ contract	USA-REL-0195961-0195962			
600	2/19/2013	Email; Meeting on Wednesday	USA-REL-0020324-0020331			
601	2/20/2013	Skadden bill for services rendered from September 1, 2012 through December 31, 2012	USA-REL-0000199-0000208			
602	2/25/2013	Email; Skadden EL	USA-REL-0303503-0303511			
603	2/25/2013	Email; Skadden EL	USA-REL-0196056			
604	2/26/2013	Email; The new agreement	USA-REL-0027444-0027445			
605	3/13/2013	Email; congratulations	USA-REL-0196573			
606	3/13/2013	Email; Inquiries re Ukraine contract	USA-REL-0196574			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
607	3/14/2013	Email; MOJ EL and Skadden EL	USA-REL-0196587-USA-REL-0196600			
608	3/19/2013	Email; Ukraine acctg	USA-REL-0196659			
609	3/20/2013	Email; Ukraine accounting	USA-REL-0196660			
611	3/25/2013	Email; final bill to Ukraine	USA-REL-0155401			
612	4/12/2013	Email; Docs	USA-REL-0236825-0236828			
613	4/23/2013	Email; Table Estimate	USA-REL-0197078-0197081			
614	6/24/2013	Skadden bill for services rendered through June 24, 2012	USA-REL-0000210-0000213			
615	8/1/2013	Skadden bill for services recorded through July 31, 2013	USA-REL-0000214			
616	11/5/2013	Skadden bill for services rendered through September 30, 2013	USA-REL-0000215-0000216			
617	11/21/2013	Skadden bill for services rendered through October 31, 2013	USA-REL-0000217-0000219			
618	Multiple	Skadden Client Escrow Account # 15662391 for Douglas E. Schoen NYC, LLC	USA-REL-0000231-0000263			
619	6/14/2017	Letter; Liquidation, Wire Transfer and Account Closing	USA-REL-0000228			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
625	2/23/2018	Document; Gates Plea Agreement	USA-0020755			
626	2/23/2018	Document; Gates Statement of Offense	USA-0020756-763			
		PHOTOGRAPHS				
650		Ken Gross	USA-00022232			
651		Greg Craig	USA-00022228			
652		Cliff Sloan	USA-00022229			
653		Michael Loucks	USA-00022235			
654		Matt Cowie	USA-00022236			
655		Alex Van Der Zwaan	USA-00022234			
656		Alex Haskell	USA-00022230			
657		Allon Kedem	USA-00022231			
659		Sergiy Vlasenko	USA-00022225			
660		Paul Manafort	USA-00022226			
661		Rick Gates	USA-00022227			
663		Rinat Kuzmin	USA-00022222			
664		Doug Schoen	USA-00022224			
665		Viktor Pinchuk	USA-00022223			
666		Segiy Lyovovhkin	USA-00022221			
667		Viktor Yanukovych	USA-00022218			
668		Yulia Tymoshenko	USA-00022216			
669		Oleksandr Lavrinovich	USA-00022220			

Ex #	Date	Description	Bates Number	Witness	ID	Admitted
670		Viktor Pshonka	USA-00022219			
671		Lawrence Spiegel	USA-00022233			
672		Jonathan Hawker	USA-00022237			
		MAPS OF UKRAINE				
675		Google map	USA-00022238			
676		Google map - Ukraine outlined	USA-00022239			
677		Map of Ukraine	USA-00022214			
678		Central and Eastern Europe	USA-00022215			
680		Stipulation regarding the time zone for emails produced by Skadden.				

Ex #	Date	Description	Bates Number	Witness	ID	Admitted